# EXHIBIT 1

## Susan Haag

From:

Timothy M Reynolds

Sent:

Wednesday, August 22, 2007 3:02 PM

To:

Susan Haag

Subject:

FW: RIAA - Thomas, J - Stip re Ownership and Registration v1.DOC



RIAA - Thomas J -Stip re Own...

----Original Message-----From: Timothy M Reynolds

Sent: Monday, August 06, 2007 8:09 AM To: 'btoder@chestnutcambronne.com'

Cc: Andrew Mohraz

Subject: RIAA - Thomas, J - Stip re Ownership and Registration\_v1.DOC

### Brian:

Attached is a draft stipulation regarding ownership and registration. Please let me know as soon as possible whether this form is acceptable to Defendant. I have included only those issues about which there should be no dispute (based on the documents and information provided to Defendant and Defendant's deposition testimony). If the parties cannot agree on a stipulation, Plaintiffs will need to move for summary judgment on these issues. Thanks very much.

#### Tim

Timothy M. Reynolds Holme Roberts & Owen LLP 1801 13th Street, Suite 300 Boulder, Colorado 80302 303.417.8510 (Direct) 303.417.8550 (Fax) 720.771.0332 (Cell) timothy.reynolds@hro.com

# Susan Haag

From:

Timothy M Reynolds

Sent:

Wednesday, August 22, 2007 2:59 PM

To:

Susan Haag

Subject: FW: Virgin Records v. Thomas

----Original Message-----

From: Brian Toder [mailto:btoder@chestnutcambronne.com]

**Sent:** Thursday, August 09, 2007 8:36 AM

To: Timothy M Reynolds

Cc: jammiet@millelacsojibwe.nsn.us Subject: Virgin Records v. Thomas

Tim,

I spoke to my client and sent her the draft stipulation. Her response is that we can so stipulate provided we have your written assurances that plaintiffs will not bring any summary judgment motions in this case.

Brian

# Susan Haag

From:

Susan Haag

Sent:

Thursday, August 09, 2007 3:49 PM

To:

'btoder@chestnutcambronne.com'

Cc:

Timothy M Reynolds; Andrew Mohraz

Subject:

Virgin Records v. Thomas (MN) Case No. 06-cv-1497-MJD/RLE

Mr. Toder,

Pursuant to Tim's request, attached is the Stipulation regarding Ownership and Registration of Copyrights. Once it is executed, Plaintiffs' will not move for summary judgment. Thank you.



1267230v1.DOC (59 KB)

## Susan

Susan Haag, Senior Paralegal Holme Roberts & Owen LLP 1700 Lincoln St., Suite 4100, Denver, Colorado 80203-4541 303.866.0311 (Direct); 303.866.0200 (Fax) susan.haag@hro.com

## Susan Haaq

From:

Timothy M Reynolds

Sent:

Thursday, August 23, 2007 6:00 AM

To:

Susan Haaq

Subject:

FW: Virgin v. Thomas

Importance:

High

----Original Message----

From:

Timothy M Revnolds

Sent: To:

Friday, August 17, 2007 9:31 AM 'btoder@chestnutcambronne.com'

Cc:

Andrew Mohraz Virgin v. Thomas

Subject: Importance:

High

Hello Brian:

I have not received the signed stipulation that we discussed last week. When we spoke earlier this week, you indicated that you would send me an email authorizing me to place your e-signature on the stipulation, and that you would also send an original signed copy in the mail. I have not received your email or the signed copy of the stipulation. I know you are in court this week and are busy, but I would appreciate your sending me your email authorization as soon as possible, as time is running very short here. Plaintiffs agreed not to file any motions for summary judgment because of the parties' stipulation, and have not done so.

Separately, Plaintiffs intend to file a motion to vacate the settlement conference set for September. You have and I have discussed a possible settlement numerous times, and I think we both agree that the conference would be a waste of time for the parties and the court. Please confirm so we can file a stipulated or unopposed motion.

I look forward to hearing from you soon.

#### Tim

Timothy M. Reynolds Holme Roberts & Owen LLP 1801 13th Street, Suite 300 Boulder, Colorado 80302 303.417.8510 (Direct) 303.417.8550 (Fax) 720.771.0332 (Cell) timothy.revnolds@hro.com